

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: BAIR HUGGER FORCED AIR
WARMING PRODUCTS LIABILITY
LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DECLARATION OF GENEVIEVE
M. ZIMMERMAN IN SUPPORT OF
PLAINTIFFS' RESPONSE
OBJECTING TO DEFENDANTS'
MOTION FOR PROTECTIVE
ORDER CONCERNING
PLAINTIFFS' SUBPOENA TO W.J.
MINKOWYCZ, PH.D.**

I, Genevieve M. Zimmerman, Esq. being first duly sworn, deposes and declares:

1. I am Co-Lead Counsel for Plaintiffs in the above entitled matter, and I make this declaration in support of Plaintiffs' Response Objecting to Defendants' Motion for a Protective Order Concerning Plaintiffs' Subpoena to W.J. Minkowycz, Ph.D.
2. Attached as Exhibit 1 is a true and correct copy of deposition of Dr. Abraham, taken in connection with the *Gareis* matter, on February 14, 2018.
3. Attached as Exhibit 2 is a true and correct copy of the Plaintiffs' subpoena to Dr. Abraham served on June 6, 2017.
4. Attached as Exhibit 3 is a true and correct copy of Dr. Abraham's article published in the Journal of Numerical Heat Transfer in August 2017.
5. Attached as Exhibit 4 is a true and correct copy of Instructions for Authors for the Journal of Numerical Heat Transfer.

6. Attached as Exhibit 5 is a true and correct copy of the acceptance letter sent to Dr. Abraham from the Journal of Numerical Heat Transfer.
7. Attached as Exhibit 6 is a true and correct copy of Dr. Abraham's CV.
8. Attached as Exhibit 7 is a true and correct copy of the publication rules for the Journal of Numerical Heat Transfer.

Executed in New Orleans, Louisiana, this 5th day of March, 2018.

/s/ Genevieve M. Zimmerman

Genevieve M. Zimmerman